

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : Bobby Whitefield, Chief, Information and Technical Services, Hazardous & Solid Waste Division
THRU : Ernest Heyer, Chief, Program Services Unit
Field Operations Division
FROM : Brian Lynch, Field Investigator
Southeast Region, Deer Park Office
SUBJECT: Emchem Corporation (Registration No. SW38184)
Other Inspection



I. INTRODUCTION

On December 19, 1988 and January 2, 1989, Brian Lynch of the District 7 Office conducted an inspection of the above referenced facility at the request of Mr. Mark Vickery, TWC Central Office Enforcement Coordinator. Mr. John Kubasik, Health Inspector with the City of Pearland, participated in the inspection on December 19, 1988. Dr. Emery Miller, Owner/Operator of the Emchem facility, participated in the inspection on January 2, 1989. Dr. Miller stated that he received tri- and tetra-ethylene glycols from an undisclosed source. This feedstock is processed through a distillation unit, removing the heavier glycol molecules as impurities.

The tri- and tetra-ethylene glycols are then sold to be used in brake fluid and the dehydration of natural gas. The heavy end "still bottoms" are accumulated in an on-site tank. In the past, this material was placed in drums. Dr. Miller stated that he has prospects of selling the "still bottoms" to fuel blenders, but to this date, has never done so.

The Emchem facility does not have a security fence and on December 19, 1988, was noted to be operated with no one on-site. The facility operates on an discontinual basis and has recently been inactive. However, at the time of the inspection(s) the facility was active.

It appears that the facility only handles Class I nonhazardous recyclable materials. Samples of contaminated soil and of the glycol still bottoms, SW14069, SW14070 and SW14071, were collected to determine if this material is a non-hazardous solid waste.

II. WASTES GENERATED

The Emchem Corporation Notice of Registration lists glycol still bottoms (WCC 140590) as the only waste generated at this facility. If this

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material can be used as a fuel as noted above, then it may be considered a by-product. However, if the material is burned for energy recovery, it would still be considered a solid waste.

III. WASTE MANAGEMENT FACILITIES

One 3000-gallon tank (approximate) was noted to store glycol "still bottoms." Approximately 150 drums were noted to be stored on the soil in various locations around the facility and according to Dr. Miller, contain the glycol "still bottoms." Dr. Miller stated that he had transferred the still bottoms from approximately 75 drums into the storage tank. He also indicated that he plans to transfer the "still bottoms" from the additional 150 drums into the on-site storage tank when he can.

A surface impoundment measuring approximately 15 x 15 x 2 feet is reported to be used to store aromatic resin from the distillation of contaminated "naphtha." Dr. Miller stated that this material was derived from the on-site distillation of naphtha conducted from 1969 to 1972.

IV. BACKGROUND INFORMATION

The Enchem Corporation was referred to the Central Office for Enforcement Action on July 7, 1987 by the District 7 office. The Central Office Enforcement Section issued an Notice of Violation (NOV) to the Enchem Corporation on February 16, 1988. The NOV cited violation of Notification Requirements, Recordkeeping, Hazardous Waste Determination, General Prohibitions, and Deed Recordation. Enchem Corporation has since notified the Texas Water Commission of their industrial solid waste recycling activities and has conducted hazardous waste determinations. Since the facility appears to handle only Class I nonhazardous recyclable material, Recordkeeping Requirements were not applicable according to Mr. Mark Vickery, TWC Central Office Enforcement Coordinator for the Enchem facility.

The Unauthorized Discharge and Deed Recordation violations have not been resolved. While Enchem has begun work on transferring the glycol still bottoms from leaking drums as stated above, they have not completed the operation and have not attempted to remove contaminated soil that resulted from the leaking drums (see attached Photos Nos. 1-B, 12, 13, 14 and 15). Also, Enchem has not attempted to Deed Record the Surface Impoundment referenced above. Additionally, Enchem is required to notify the TWC of the Surface Impoundment and its contents.

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V. VIOLATIONS

No additional violations were noted to those previously cited in the NOV sent from the Central Office to the Enchem Corporation on February 16, 1988 (please see attached NOV). However, ongoing violations include the threat of discharge to State waters as evidenced by the leaking drums in the attached photographs, failure to notify of and deed record a surface impoundment and failure to remediate existing soil contamination.

This is submitted as file data.

Signed: Brian Lynch
Brian Lynch
Field Investigator

Approved: W. J. Van Evers
W. J. Van Evers, Manager
Hazardous & Solid Waste

WJV/BL/rm

cc: John Kabasik, City of Pearland